

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

June 8, 2005
By Bruce Rifkin Clerk
H. Brent Zachary Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARRELL J. MORRIS,
MICHAEL P. BARTOLO,
STEVEN D. GLENN, and,
JASON R. GORDEN,

Defendants.

NO. **CR05 0232P**

INDICTMENT

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

05-CR-00232-INDI

The Grand Jury charges that:

COUNT 1

(Felon in Possession of a Firearm)

On or about September 6, 2002, at Whatcom County, within the Western District of Washington, DARRELL J. MORRIS, having been convicted of crimes punishable by imprisonment for a term exceeding one year, that is, Burglary in the Second Degree, in Whatcom County Superior Court, cause number 82-1-00441-6, did knowingly possess a firearm to wit: one Winchester .22 caliber rifle, Model 72-22, one Savage Arms .22 caliber rifle, Model 29B, one Remington .22 calibre rifle, Model: 511-P, the Scoremaster, and one Westernfield .20 guage shotgun, Model: 30 25EKN-164A, all of which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2

(Felon in Possession of a Firearm-- Armed Career Criminal)

On or about September 6, 2002, at Whatcom County, within the Western District of Washington, MICHAEL P. BARTOLO, having been convicted of crimes punishable by imprisonment for a term exceeding one year, that is:

- (A) Residential Burglary, in Whatcom County Superior Court, 95-1-00449-3
- (B) Robbery in the First Degree, in Whatcom County Superior Court, 98-1-00132-4
- (C) Residential Burglary, in Whatcom County Superior Court, 98-1-01099-4

did knowingly possess a firearm to wit: one Bryco Arms, 9mm, Jennings Nine, serial number 1270112, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1)..

COUNT 3

(Felon in Possession of a Firearm)

On or about October 10, 2002, at Whatcom County, within the Western District of Washington, DARRELL J. MORRIS, having been convicted of crimes punishable by imprisonment for a term exceeding one year, that is, Burglary in the Second Degree, in Whatcom County Superior Court, cause number 82-1-00441-6, did knowingly possess a firearm to wit: one Charter Arms .38 Special Revolver, Model: undercover, serial number 577188 and one Mossberg .308 Winchester rifle, Model: 800AM-CAL 308 WIN, serial number 113415, all of which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 4

(Possession of an Unregistered Sawed Off Shotgun)

On or about November 15, 2002, at Whatcom County and elsewhere, within the Western District of Washington, DARRELL J. MORRIS and STEVEN D. GLENN, did possess, and aid and abet in the possession of, a firearm, to wit: one 20 gauge E.R. Amantino sawed off shotgun, one 12 gauge Remington Arms, sawed off shotgun serial number 287463V, and one 20 gauge, Steven J. Arms, sawed off shotgun, all of which

1 were not registered to either DARRELL J. MORRIS or STEVEN D. GLENN in the
2 National Firearms Registration and Transfer Record.

3 All in violation of Title 26, United States Code, Sections 5841, 5861(d),
4 and 5871 and Title 18, United States Code, Section 2.

5 COUNT 5

6 (Transportation of a Stolen Motorcycle)

7 On or about November 15, 2002, within the Western District of Washington,
8 DARRELL J. MORRIS and STEVEN D. GLENN, did unlawfully transport, and aid and
9 abet in the unlawful transport, in interstate commerce a stolen motor vehicle,
10 that is, a 2000 Harley Davidson, FXR4, bearing Washington license number 688042,
11 from the State of Washington to the State of Oregon, knowing the same to be stolen.

12 All in violation of Title 18, United States Code, Section 2312.

13 COUNT 6

14 (Felon in Possession of a Firearm)

15 On or about January 16, 2003, at Whatcom County, within the Western District
16 of Washington, JASON R. GORDON, having been convicted of crimes punishable by
17 imprisonment for a term exceeding one year, that is, Attempting to Elude a Pursuing
18 Police Officer, in Snohomish County Superior Court, 98-1-00508-9, did knowingly
19 possess a firearm to wit: one SKS semi-automatic rifle, which had been shipped and

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1 transported in interstate or foreign commerce.

2 All in violation of Title 18, United States Code, Section 922(g)(1).

4 A TRUE BILL:

5 DATED:

6
7 Signature of Foreperson redacted pursuant
8 to the policy of the Judicial Conference

9
10
11 FOREPERSON

12 
JOHN MCKAY


United States Attorney

13 
DOUGLAS B. WHALLEY

Assistant United States Attorney

14 
YE-TING WOO

Assistant United States Attorney

15 
BRUCE F. MIYAKE

Assistant United States Attorney